

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ELISABETH DOHERTY

Plaintiff,

v.

AMERICAN INTERNATIONAL
COLLEGE

Defendant.

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CIVIL ACTION NO. 1:17-CV-10161

APPENDIX OF EXHIBITS
TO DEFENDANT'S LOCAL RULE 56.1 STATEMENT OF MATERIAL FACTS
IN SUPPORT OF DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

- Exhibit 1 Deposition of Elisabeth Doherty - Redacted
- Exhibit 2 Defendant's Answers to Interrogatories
- Exhibit 3 2012-2013 Student Handbook Policies
- Exhibit 4 2013-2014 Student Handbook Policies
- Exhibit 5 2014-2015 Student Handbook Policies
- Exhibit 6 Affidavit of Nicole Cestero with Exhibits A-O:
- Exhibit A – 2011 Title IX Training
- Exhibit B – 2011/2012 United Educators Advisories
- Exhibit C – 2013 Title IX Training
- Exhibit D – 2014 Title IX Training
- Exhibit E – 2013-2014 Title IX Training
- Exhibit F – 2014 United Educators Guide Preventing Student Assault
- Exhibit G – 2015 Title IX AIC/Paper Clip Communications Title IX Brochure
- Exhibit H – 2015 AIC VAWA Brochure
- Exhibit I – 2014 Student SaVE Act Training
- Exhibit J – 2014 -2015 AIC Statement on Drug and Alcohol Use
- Exhibit K – Residence Life Pamphlet
- Exhibit L – 2014-2015 Clery Reports
- Exhibit M – 8/30/14 Verbal Statements - Redacted
- Exhibit N – 9/1/14 Phone Record - Redacted
- Exhibit O – 9/19/14 Title IX Training
- Exhibit 7 Deposition of Matthew Scott - Redacted

Exhibit 8 Investigation Report - Redacted

Exhibit 9 Doherty's Written Statement - Redacted

Exhibit 10 JK Statement - Redacted

Exhibit 11 EM Statement - Redacted

Exhibit 12 SD Statement - Redacted

Exhibit 13 Campus Police Report - Redacted

Exhibit 14 Title IX Victims' Rights form

Exhibit 15 Sexual Misconduct Reference Guide

Exhibit 16 Text Messages - Redacted

Exhibit 17 O'Shaughnessy Emails – 9/4/14

Exhibit 18 No Contact Order - 9/5/14 - Redacted

Exhibit 19 Campus Police Incident Report – 9/8/14 - Redacted

Exhibit 20 Emails – 9/8/14 & 9/9/14 - Redacted

Exhibit 21 Email – 9/9/14 - Redacted

Exhibit 22 Updated No Contact Order – 9/11/14 - Redacted

Exhibit 23 Deposition of Bruce Johnson - Redacted

Exhibit 24 Email and Letter Regarding Hearing – 10/21/14

Exhibit 25 Title IX Procedures

Exhibit 26 Emails – 10/22/14 - Redacted

Exhibit 27 Transcript of the 10/27/14 Board Hearing

Exhibit 28 Hearing Board Decision Letter – 10/28/14 - Redacted

Exhibit 29 Doherty Appeal

Exhibit 30 Appeal Decision Letter - Redacted

Exhibit 31 Request to Withdraw

Exhibit 32 Leave of Absence Emails

Exhibit 33 Approval of Request for Leave of Absence

Respectfully Submitted,

AMERICAN INTERNATIONAL COLLEGE
By Its Attorneys,

/s/ Ariel G. Sullivan

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on this 5th day of July, 2018.

/s/ Ariel G. Sullivan

Ariel G. Sullivan